

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CATICE MOSLEY)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.
v.)	1:23-CV-04033-MHC
)	
MERCHANTS DISTRIBUTORS, LLC;)	JURY TRIAL DEMAND
DUSTIN LANE KIRBY; and)	
SAFETY NATIONAL CASUALTY)	
CORP,)	
)	
Defendants.)	

PLAINTIFF’S EXPERT DISCLOSURE NOTICE

COMES NOW, Plaintiff Catice Mosely (“Plaintiff”), by and through her undersigned attorney, and hereby files her expert disclosure notice as follows:

Obinwanne Ugwonal, MD
Peachtree Orthopaedic Clinic
800 Peachtree Street NE, Suite E2
Atlanta, Georgia 3030
Tel: (404) 254-3319

Dr. Obinwanne is expected to testify that Plaintiff had complaints of shoulders, neck, lower back pain, and headaches following the August 16, 2021, motor vehicle accident. Dr. Ugwonal will testify regarding his findings, diagnoses, and treatment recommendations for Plaintiff’s symptoms. Dr. Ugwonal is expected to testify that Plaintiff was diagnosed with low back pain, neck muscle strain, low back strain, neck pain, cervical spinal stenosis, and disc

protrusion of the thoracic spine and treated with medications, injections, and physical therapy. Dr. Ugwonali will opine as to the cause of Plaintiff's injuries. Dr. Ugwonali is expected to opine that Plaintiff's pain, cervical spine strain, lumbar spine strain, and spinal injuries were caused or aggravated by August 16, 2021, motor vehicle accident.

The bases for Dr. Ugwonali's opinions include but are not limited to his evaluation and treatment of Plaintiff, his review of Plaintiff's medical records and medical history, and his education, training and experience in the fields of orthopedic surgery. A true and correct copy of Dr. Ugwonali's curricula vitarum will be produced.

Dong Wang, MD
Georgia Neurodiagnostic & Treatment Center
483 Upper Riverdale Rd., Ste. F
Riverdale, GA 30274
770-907-7665

Dr. Wang is expected to testify that Plaintiff had complaints of paresthesia in her feet and fingers and headaches following the August 16, 2021, motor vehicle accident. Dr. Wang will testify regarding his findings, diagnoses, and treatment recommendations for Plaintiff's symptoms. Dr. Wang is expected to testify that Plaintiff was diagnosed with TBI, post-concussion syndrome, paresthesia, carpal tunnel syndrome, occipital neuralgia, lesion of ulnar nerve in both upper limbs, and treated with medications. Dr. Wang will opine as to the cause of Plaintiff's

injuries. Dr. Wang is expected to opine that the August 16, 2021, motor vehicle accident is the cause of Plaintiff's headaches and the paresthesia in her fingers and feet.

The bases for Dr. Wang's opinions include but are not limited to Dr. Wang's evaluation and treatment of Plaintiff, his review of Plaintiff's medical records and medical history, and his education, training and experience in the fields of neurology. A true and correct copy of Dr. Wang's curricula vitarum will be produced.

Plaintiff reserves the right to supplement her expert disclosures as permitted by the Federal Rules of Civil Procedure and to rely upon the testimony, or portions thereof, of witnesses identified by any party to this case.

Respectfully submitted, this 8th day of May, 2024,

GREENE LEGAL GROUP LLC

By: /s/ Jasmine M. Williams

Reginald A. Greene

Georgia Bar No. 308674

Jasmine M. Williams

Georgia Bar No. 117912

Attorney for Plaintiff

One Georgia Center, Suite 605
600 West Peachtree Street
Atlanta, Georgia 30308
(404) 574-4308
Facsimile: (404) 574-4312
rgreene@greenelegalgroup.com
jcobbs@greenelegalgroup.com

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed Plaintiff's Expert Disclosure Notice with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Matthew P. Stone
Shawn N. Kalfus
Aleksandra Mitchell
STONE KALFUS LLP
One Midtown Plaza
1360 Peachtree Street NE
Suite 1250
Atlanta, GA 30309
Matt.stone@stonekalfus.com
Shawn.kalfus@stonekalfus.com
Alex.mitchell@stonekalfus.com

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted, this 8th day of May, 2024,

GREENE LEGAL GROUP LLC

By: /s/ Jasmine M. Williams

Reginald A. Greene

Georgia Bar No. 308674

Jasmine M. Williams

Georgia Bar No. 117912

Attorney for Plaintiff

One Georgia Center, Suite 605
600 West Peachtree Street
Atlanta, Georgia 30308
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